## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Chapter 11
In re:	)
Lordstown Motors Corp., et al., 1	) Case No. 23-10831-MFW (Jointly Administered)
Debtors.	) Re Docket No. 492

## OBJECTION OF NEXTEER AUTOMOTIVE CORPORATION TO DEBTORS' SECOND SUPPLEMENTAL NOTICE OF (I) POTENTIAL ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES AND (II) CURE AMOUNTS

Nexteer Automotive Corporation ("Nexteer"), by and through its undersigned counsel, for its objection to the Debtors' Second Supplemental Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts [D.I. 492], states:

- 1. In the Debtors' Second Supplemental Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts, the Debtors show an alleged agreement with Nexteer on their attached schedule of existing contracts to potentially be assumed.
- 2. There are no existing contracts between Nexteer and any of the Debtors in existence which may be assumed.
- 3. Nexteer therefore objects to the Debtors' suggestion that one or more contracts with Nexteer may be assumed, because there are none to assume.

<sup>&</sup>lt;sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

WHEREFORE, Nexteer respectfully requests that the schedule attached to the Debtors' Second Supplemental Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts be amended to delete Nexteer.

Dated: October 11, 2023 COZEN O'CONNOR

/s/ Simon E. Fraser

Simon E. Fraser (No. 5335) 1201 N. Market Street, Suite 1001 Wilmington, DE 19801-1147

T: 302-295-2011 sfraser@cozen.com

-and-

BROOKS WILKINS SHARKEY & TURCO PLLC Matthew E. Wilkins (admitted pro hac vice) 401 South Old Woodward, Suite 400 Birmingham, MI 48009 Telephone: (248) 971-1800

Telephone: (248) 971-1800 E-mail: wilkins@bwst-law.com

Counsel to Nexteer Automotive Corporation